

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<i>Caption in Compliance with D.N.J. LBR 9004-1(b)</i> SAUL EWING LLP Stephen B. Ravin, Esquire Turner N. Falk, Esquire One Riverfront Plaza 1037 Raymond Blvd., Suite 1520 Newark, NJ 07102-5426 Telephone: (973) 286-6714 E-mail: stephen.ravin@saul.com turner.falk@saul.com	
<i>Counsel to the Debtors and Debtors in Possession</i>	
In re:	Chapter 11
NEW JERSEY ORTHOPAEDIC INSTITUTE LLC, <i>et al.</i> ,	Case No. 25-11370 (JKS)
Debtors. ³	(Jointly Administered)

**DECLARATION OF KINGA SKALSKA-DYBAS
PURSUANT TO SECTION 365(d)(4) OF THE BANKRUPTCY CODE**

I, Kinga Skalska-Dybas, hereby declare as follows:

1. I am the Chief Financial officer of the above-captioned debtors and debtors in possession (collectively, the “Debtors”). I am generally familiar with the Debtors’ day-to-day operations, business and financial affairs, and books and records.

2. No request has been made for the appointment of a trustee or examiner, and no official committee of unsecured creditors has been established in this case. The Debtors are authorized to continue to operate their businesses and manage their properties as debtors in

³ The last four digits of Debtor New Jersey Orthopaedic Institute LLC’s tax identification number are 3560; the last four digits of Debtor Northlands Orthopaedic Institute LLC’s tax identification number are 9828. The location of both Debtors’ principal place of business and the Debtors’ service address in these Chapter 11 Cases is 504 Valley Road, Suite 200, Wayne NJ 07470.

possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

3. Collectively, the Debtors form an orthopaedic and sports medicine practice that provides medical and surgical services to patients. The practice also offers services to numerous local schools, as well as medical coverage during high school football games. As of the Petition Date, the practice had four doctors and one mid-level provider.

4. The Debtors primarily operate their businesses out of 504 Valley Road, Suite 200, Wayne, New Jersey 07503 (the “Wayne Facility”). The Debtors lease the Wayne Facility from Valley Partners, LLC.

5. In addition to the Wayne Facility, the Debtors have Real Property Leases for: (i) 111 Madison Ave, Suite 400, Morristown, NJ 07962, leased from AHS Investment Corporation; (ii) 1900 Union Valley Rd, Hewitt, NJ 07421, leased from MJD Realty; (iii) 45 Carey Avenue, Butler, NJ 07405, leased from New Jersey Center for Arthritis and Osteopathy; and (iv) 2520 John F. Kennedy Blvd, Suite C1-Office 2, Jersey City, NJ 07304, leased from Gramercy Pain Center, LLC.

6. The Debtors are in the process of resolving certain key disputes in the bankruptcy cases, and intend to propose a plan in short order.

7. I submit that cause exists to extend the time for the Debtors to assume or reject the Real Property Leases until the Debtors are able to formulate a plan.

8. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: May 16, 2025

Respectfully submitted,

/s/ Kinga Skalska-Dybas
Kinga Skalska-Dybas
Chief Financial Officer